

**SCHULTE ROTH & ZABEL LLP**

Barry A. Bohrer (admitted *pro hac vice*)  
Michael L. Yaeger (admitted *pro hac vice*)  
Cara David  
919 Third Avenue  
New York, New York 10022  
Tel: (212) 756-2000  
*Attorneys for Defendant Deborah Jorn*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC. SECURITIES  
LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Master No. 3:15-cv-7658-MAS-LHG

Motion Day: January 3, 2017

*Oral Argument Requested*  
(Document Electronically Filed)

**DECLARATION OF CARA DAVID**

I, **CARA DAVID**, of full age, do hereby declare as follows:

1. I am an associate with the law firm Schulte Roth & Zabel LLP, attorneys for defendant Deborah Jorn (“Ms. Jorn”) in this matter. I am admitted to practice in good standing before the United States District Court for the District of New Jersey, United States District Courts for the Southern and Eastern Districts of New York, as well as the United States Courts of Appeals for the Second and Third Circuits. I respectfully submit this Declaration in support of Ms. Jorn’s

Reply Memorandum of Law in Further Support of Defendant Jorn's Motion to Dismiss Plaintiffs' Consolidated Complaint.

2. Attached hereto as Exhibit 1 is a true and correct copy of Valeant's 2016 Proxy Statement (Schedule 14A) filed with the Securities and Exchange Commission on April 29, 2016.

3. Attached hereto as Exhibit 2 is a true and correct copy of Natalie Grover, *Valeant reiterates key executive resigned, was not asked to go*, REUTERS, March 3, 2016.

Pursuant to 28 U.S.C. § 1746, I affirm under penalty of perjury that the above statements are true and correct.

Dated: New York, New York  
December 14, 2016

SCHULTE ROTH & ZABEL LLP

By: /s/ Cara David  
Cara David

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(212) 756-2000

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